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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

JESSE DENT and KIMBERLY DENT,

Plaintiffs,

v.

**EQUIFAX INFORMATION SERVICES
LLC, a foreign corporation,**

Defendant.

Case No. **CV '08 - 6193, AA**

COMPLAINT

(Fair Credit Reporting Act)

Jury Trial Requested

1.

This Court has jurisdiction pursuant to 15 U.S.C. § 1681p.

2.

Plaintiff Jesse Dent is a consumer as defined by the Fair Credit Reporting Act, 15 U.S.C. § 1681a(c).

3.

Plaintiff Kimberly Dent is a consumer as defined by the Fair Credit Reporting Act, 15 U.S.C. § 1681a(c).

4.

#21857

Defendant Equifax Information Services, LLC (“Equifax”) is a consumer reporting agency as defined by the Fair Credit Reporting Act, 15 USC § 1681a(f).

5.

In 2003, Jesse Dent brought an action against Equifax in this Court for violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681 *et seq.*, based on Equifax’s false and inaccurate reporting about him, including putting his sister’s credit and personal information on his credit report, and not correcting inaccurate information which he disputed.

6.

In 2004, Jesse Dent and Equifax settled the case he had brought against Equifax.

7.

After the case against Equifax was settled, and during the past two years, Equifax again reported false and inaccurate information concerning Jesse Dent. Equifax reinserted information into his credit file which had previously been deleted. Equifax also included false and inaccurate information in reports concerning Kimberly Dent, who is married to Jesse Dent.

FIRST CLAIM FOR RELIEF

(Negligent Noncompliance with FCRA)

8.

Plaintiffs reallege and incorporate paragraphs 1 through 7.

9.

Equifax negligently failed to comply with the requirements of FCRA, 15 USC § 1681 *et seq.*

10.

As a result of defendant’s failure to comply with the requirements of FCRA, plaintiffs have suffered, and continue to suffer, actual damages, including economic loss, denial of credit, increased cost of credit, lost opportunity to receive credit, damage to reputation, invasion of privacy, emotional distress, and interference with normal and usual activities for which plaintiffs

seek damages in an amount to be determined by the jury.

11.

Plaintiffs request attorney fees pursuant to 15 USC § 1681o(a).

SECOND CLAIM FOR RELIEF

(Willful Noncompliance with FCRA)

12.

Plaintiffs reallege and incorporate paragraphs 1 through 7.

13.

Equifax willfully failed to comply with the requirements of FCRA, 15 USC § 1681 *et seq.*

14.

As a result of defendant's failure to comply with the requirements of FCRA, plaintiffs have suffered, and continue to suffer, actual damages, including economic loss, denial of credit, increased cost of credit, lost opportunity to receive credit, damage to reputation, invasion of privacy, emotional distress, and interference with normal and usual activities for which plaintiffs seek damages in an amount to be determined by the jury. Plaintiffs also seek punitive damages in an amount to be determined by the jury.

15.

Plaintiffs request attorney fees pursuant to 15 USC §1681o(a).

Plaintiffs request a jury trial on all claims.

Prayer

WHEREFORE, plaintiffs pray for judgment against Equifax as follows:

On the First Claim for Relief:

1. Actual damages to be determined by the jury; and
2. Attorney fees.

On the Second Claim for Relief:

1. Actual damages to be determined by the jury;
2. Punitive damages to be determined by the jury; and
3. Attorney fees.

On all Claims for Relief: costs and disbursements.

Dated this 26th day of June 2008.

Respectfully Submitted,



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